

### Remarks

Applicants respectfully request entry of the above amendment and reconsideration in view of the amendment and the following remarks.

The status of the application is as follows. Claims 1-16 remain pending in the application. Claims 1-16 stand rejected under 35 U.S.C. §102(b) as allegedly being unpatentable over WO 99/60788 to *Potts et al.*

#### *Rejections under 35 U.S.C. §102*

Claims 1-16 stand rejected under 35 U.S.C. §102(b) as allegedly being anticipated by *Potts et al.*

The Examiner alleges that *Potts et al.* discloses a video conference system for locating the speaker comprising an image pickup device for generating image signals representative of an image, an audio pickup device for generating audio signals representative of a sound from an audio source, a processing means (multimodal integration architecture) for processing the image signals and audio signals to determine a direction of the audio source relative to a reference point. *Potts et al.* allegedly also discloses that at least two microphones can be used as an array for generating audio signals representative of a sound from an audio source.

Applicants respectfully disagree with this analysis.

Applicants submit that *Potts et al.* does not disclose each and every feature of Applicants' invention as claimed in independent claim 1. More particularly, *Potts et al.* does not disclose "a stationary image pickup device for generating image signals representative of an image" as claimed in amended claim 1. The stationary image device claimed by Applicants is a device such as, *inter alia*, a "stationary" video camera which remains motionless during operation, that is, it does not physically move when a pan, tilt or zoom is performed. The typical movements associated with a camera, such as pan, tilt and zoom movements, are performed by electronic manipulation of the camera image rather than by physical movement of the camera itself.

The method of independent claim 10 also claims a "stationary image pickup device". Similarly, independent claim 16 claims a "stationary video camera".

In contrast, *Potts et al.* discloses a camera and a corresponding "positioning device" which changes the physical orientation of the camera. The "positioning device is capable of positioning the camera, for example, for tilting, panning, or zooming the camera." See *Potts et*

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*al.*, Description, page 1, fourth paragraph under the "Somma" heading. *Potts et al.* is completely silent regarding a stationary image device.

Applicants respectfully submit that *Potts et al.* does not teach each and every feature of Applicants' invention as claimed in independent claims 1, 10 and 16. Applicants maintain, therefore, that claims 1, 10 and 16 are not anticipated by *Potts et al.*

Dependent claims 2-9 and 11-15 depend variously from independent claims 1 and 10, and are therefore allowable for the same reasons.

#### Conclusion

Accordingly, based on the preceding arguments, Applicants respectfully submit that claims 1-16, and the entire application, are in condition for allowance and therefore request favorable action. However, should the Examiner believe anything further is necessary in order to place the application in better condition for allowance, or if the Examiner believes that a telephone interview would be advantageous to resolve the issues presented, the Examiner is invited to contact the Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

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